

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

-against-

JASON GALANIS, et al.,

Defendants.
-----X

Motion granted SO ORDERED with VSDJ 11-26-19
Docket No. 16-cr-371 (PKC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that the defendant, Jason Galanis, through undersigned counsel, respectfully moves this Court to vacate his conviction “in the interests of justice,” pursuant to Federal Rule of Criminal Procedure 33(a). Vacatur of the conviction is necessary to permit Mr. Galanis to plead guilty to a “joint” plea agreement, originally offered to Mr. Galanis by the government on July 19, 2016, that would dispose of the charges both in the above-captioned matter (the “Wakpamni” matter) as well as in case number 15-cr-643 (the “Gerova” matter), which is also pending before Your Honor. The government has indicated that it **consents** to the relief sought in the instant motion.

Date: November 15, 2019

/s/ Christopher Madiou
Christopher Madiou, Esq.
233 Broadway, Suite 2208
New York, New York 10279
(917) 408-6484

Daniel S. Nooter, Esq.
1380 Monroe Street, N.W., #427
Washington, D.C. 20010
(202) 215-0512

Attorneys for Jason Galanis